DOCKET FILE CO **ORIGINAL**

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Implementation of the Pay	)	CC Docket No. 96-128
Telephone Reclassification	)	
and Compensation Provisions of the	)	
Telecommunications Act of 1996	)	

REMAND REPLY COMMENTS OF THE ILLINOIS PUBLIC TELECOMMUNICATIONS ASSOCIATION

Michael W. Ward
John F. Ward, Jr.
Henry T. Kelly
O'Keefe, Ashenden Lyons & Ward
30 North LaSalle, Suite 4100
Chicago, IL 60602
312-621-0400
Fax: (312) 621-0400

Counsel for the Illinois Public Telecommunications Association

Dated: September 9, 1997

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Implementation of the Pay	)	CC Docket No. 96-128
Telephone Reclassification	)	
and Compensation Provisions of the	)	
Telecommunications Act of 1996	)	

REMAND REPLY COMMENTS OF THE
ILLINOIS PUBLIC TELECOMMUNICATIONS ASSOCIATION

The Illinois Public Telecommunications Association ("IPTA") submits the following Reply Comments to the comments filed August 26, 1997, in response to the Federal Communications Commission's ("FCC") Notice for Comment on Remand Issues in the Payphone Proceeding.

I. INTRODUCTION.

The United States Court of Appeals remanded the FCC's determination, setting the rate on compensation for access code and subscriber 800 calls on payphones at the market rate for deregulated local coin calls, on the basis that the FCC failed to explain or justify its conclusion. *Illinois Public Telecommunications Association v. Federal Communications Commission,* __ *F.3d* __ *(D.C.Cir. 1997).* The Court referred to numerous comments by interexchange carriers ("IXCs") that the price of local coin calls is an inappropriate compensation surrogate because the cost of coin calls is higher than coinless calls, such as access code and subscribere 800, due to the additional expense of coin equipment and coin collection. The Court also alluded to IXC comments that local coin call costs are higher because they include the cost for originating and completing local calls while coinless calls only bear the cost of originating calls. Because of the *Payphone Orders'*[1] failure to explain their rejection of the points raised by the IXCs, the matter was remanded to the FCC for further consideration.

The FCC's Notice seeks comments on: (1) the differences in costs to the payphone service provider ("PSP") of originating subscriber 800 calls and access code calls versus local coin calls; (2) how these cost differences should affect market base compensation amounts; and (3) whether the local coin rates, subject to an offset for expenses unique to those calls, is an appropriate per call compensation rate for calls not compensated pursuant to contract or other arrangement.

The IPTA notes that the Appellate Court did not disagree with the FCC's determination, but, rather, indicated that the FCC's *Payphone Orders* did not provide an analysis or response to these points raised by the IXCs. Without any such explanation in the *Payphone Orders*, the Court found that it had no basis for sustaining the conclusion. In the Remand proceedings, the Court calls upon the FCC to explain and respond to the points raised by the IXCs. Numerous comments have been filed in response to the FCC's Notice. The IPTA submits that the evidence before the FCC is extensive in establishing and supporting that a per call compensation level of $0.35 is a minimal level of justifiable compensation.

II. THE FCC MUST NOT ALLOW ITSELF TO BE CONFUSED BY CARRIERS WHICH SEEK TO MIX COST ANALYSIS WITH MARKET ANALYSIS.

[1] *In the Matter of Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996*, CC Docket Nos. 96-128, 91-35, Released September 20, 1996 (*"Payphone Compensation Order"*); *Order on Reconsideration*, Released November 8, 1996 (*Reconsideration Order"*) (Combined *"Payphone Orders"*).

The IPTA respectfully submits that the FCC has before it a very extensive record upon which to base its determination. However, some parties have sought to obfuscate the issues through their mixing of apples and oranges as a substitute for substantive positions. Therefore, it is essential that if the FCC is to proceed forward, it must start with the basics and maintain clarity in what is being analyzed. In the absence of any established charge for access code calls and 800 subscriber service calls from payphone facilities, two forms of analysis have been undertaken to determine an appropriate basis for setting a compensatory rate: 1) the underlying cost of the payphone facilities averaged across the amount of traffic on that payphone facility to determine an average incremental cost per call which must be recovered; and 2) market comparisons of the value of utilization of payphone facilities. Although some parties have sought to intertwine these distinct approaches, the FCC must be vigilant in insisting that analyses remain consistent with the purport approach being applied.

The FCC's *Payphone Orders* concluded that the market would best set the appropriate price for payphone calls in the long term, and established the deregulated local coin call rate as a market based determination of fair compensation. *Payphone Compensation Order* at par. 70. It must be remembered that the deregulated local coin call rate is the price of a call, not its cost. Costs are recovered by a carrier or company on the basis of the totality of its revenues, which are determined by the totality of its traffic volumes and prices. The price for local coin traffic is the lowest price of all the prices, coin and noncoin, set for calls through payphone facilities. The telecommunications marketplace has traditionally associated higher rates with longer distance calls. However, on the cost basis, as opposed to the price basis, the costs of longer distance calls do not increase as rapidly as the price. This allows for higher margins on calls of longer distance. When seeking to recover costs, particularly fixed costs in setting market prices, a carrier often recovers more of its fixed costs through its higher margin offering, seeking to use those margins to subsidize any costs not recovered in the lower priced calls.

When the Illinois Commerce Commission determined that Illinois Bell Telephone Company/Ameritech Illinois' competitive payphone services needed to raise its coin rates $10.5 million to recover its costs, Ameritech adjusted its coin rates across the entire spectrum of coin calls. (See IPTA Comments filed July 1, 1996, Appendix A - *Independent Coin Payphone Association v. Illinois Bell Telephone,* ICC Docket No. 88-0412, Order, June 7, 1995, pp. 20-21.) Ameritech did not have higher fixed costs for longer distance calls. A payphone's fixed costs are unaffected by the distance of a call. But the costs were recovered throughout the various coin rates, not just through increasing the initial local coin charge to $0.35. The local coin rate itself did not recover these costs but was assisted by a disproportionate recovery from the higher priced calls. If costs are recovered at all, they are recovered through the gross revenues, or average revenue per call, not through the initial charge for the lowest priced call.

Although local coin calls also traditionally have the largest call volumes, the inclusion of other coin traffic, even with substantially lower volumes, can only result in increasing the average coin rate per call from a payphone station. The local coin rate by itself does not identify for the Commission the average cost per call of the payphone station. The Commission has already noted that many jurisdictions with regulated coin rates often subsidize local coin rates. *Payphone Compensation Order* at par. 68. The Commission selected a deregulated market on the assumption that, freed of regulation, a carrier would seek to recover its cost in setting its prices. However, markets also seek to avoid sudden rate shocks and are subject to the market expectations of its consumers. A payphone provider in a deregulated market would seek to recover all of its costs through the sum total of all of its revenues.

Fixed costs, by definition, do not vary and would maintain a constant average fixed cost per call. In seeking to deduce the probable fixed cost per call by looking at pricing, the analysis would first have to look at the weighted *average price* per call. Although local coin calls would generally constitute the largest volume of coin traffic, all other coin traffic would be at rates higher than local and, despite lesser volumes, can only result in an increasing the average coin rate per call from which fixed costs are recovered. If one adds to this analysis the nonsent paid calls, those prices generally exceed local coin rates thus further increasing the weighted average price per call upon which fixed costs are recovered. As the Commission can see from this analysis, seeking to determine *costs* by looking at *prices* involves numerous factors.

The IPTA cautions the Commission of the traps laid by some parties seeking other than a factual determination of sound policy. When discussing costs, a party should focus its attention on the costs. When discussing market based rates, the party should focus on market based comparables. But when seeking to extrapolate or analyze a cost when reviewing a rate, or to analyze a rate when reviewing a cost, the numerous factors which go into this cost analysis must be included. The Commission has before it in the record extensive cost data to analyze the cost of the payphone services. Separately, the Commission has numerous market rates presented for analysis of the market's determination of the value of payphone services. Through the analysis of this data of record, the questions posed by the Commission can be addressed.

III. THE RECORD SUPPORTS A PER CALL COMPENSATION LEVEL OF NO LESS THAN $0.35 PER CALL.

A number of parties have submitted arguments regarding cost data in this proceeding. Although, the FCC elected to rely upon the deregulated market rate for a local coin call, the cost information must again be reviewed in light of the IXCs' arguments addressing underlying costs. The FCC referred to the costs submitted in the initial proceeding as surrogate data, although in total it constituted the overwhelming majority of the payphones in issue. *Payphone Compensation Order* at par. 67. In that round of proceedings, the RBOC Payphone Coalition submitted a cost analysis of six of the seven Regional Bell Operating Companies ("RBOCs"). Peoples Telephone Company, Inc. ("Peoples") one of the largest independent payphone providers ("IPPs") submitted its own embedded cost analysis. MCI submitted a report from Hatfield Associates extrapolating its own conclusions from selected data found in a Southern New England Telephone ("SNET") cost study of incremental payphone costs in New Hampshire. The IPTA submitted a cost analysis from a proceeding before the Illinois Commerce Commission investigating the setting of a payphone compensation rate for access code and subscriber 800 calls. The FCC noted that these studies included variances in approaches and conclusions. However, a review of the data also reflects some consistencies and addresses some of the cost questions promoted by the IXCs, which analysis has been required by the Appellate Court.

In the Remand comments, a number of parties submitted additional cost information. RBOC/GT/SNET Payphone Coalition Remand at 15-20; American Public Communications Counsel ("APCC") Remand at 11-16; People's Remand at 8-15; Communications Central Inc. ("CCI") Remand at 6-10; Teleleasing Enterprises, Inc. Remand at 4-10; AT&T Remand at 10-13. MCI relies upon the Hatfield Report submitted in its July 1, 1996 Comments. MCI Remand at 3. The IPTA already submitted its cost analysis in its July 1, 1996 Comments.[2] Except for AT&T and MCI, this cost data shows fixed non-traffic sensitive costs averaged over the number of calls to the payphone facility ranging from a low of $0.2953 per call to a high of $0.55 per call. These studies exclude the usage costs referred to by the Appellate Court. The MCI and AT&T cost submissions purport that the fixed non-traffic sensitive costs, averaged over the number of calls to the payphone, result in an average fixed cost of $0.083 (MCI) to $0.11 (AT&T) per call. As the Commission has already recognized in the *Payphone Compensation Order*, the variety of inputs,

2 A number of carriers have made reference to a statement made by SNET before the Massachusetts Department of Public Utilities that the cost of a local coin call is $0.167 per call. In contrast to the above cost analysis, this unexplained statement provides no breakdown, support, or analysis.

arguments, and analyses involved in ascertaining the appropriate and relevant costs make a cost-based analysis difficult to reconcile and regulate.

For example, as identified by the RBOC/GT/SNET Payphone Coalition, MCI's Hatfield analysis selectively picked a single low cost for indoor coinless payphone stations without even identifying and describing to the FCC the other payphone station costs in the study. The SNET New Hampshire payphone study actually included six different payphone station costs for semi-public and public payphones. Hatfield selected only the coinless station costs for indoor payphones of $300.39, on the theory that coinless payphones were a better cost surrogate than coin payphones for access code and 800 subscriber calls. What Hatfield did not inform the FCC is that it totally ignored the station cost for coinless outdoor payphones of $1,289.19 per station. As identified in the RBOC/GT/SNET Payphone Coalition Remand Comments, Arthur Andersen Report at 8, the difference between coinless indoor ($300.39) and coin indoor ($335.76) and of coinless outdoor ($1,289.19) and coin outdoor ($1,324.56) is not nearly as significant as the difference between coinless indoor ($300.39) and coinless outdoor ($1,289.19). Although Hatfield purportedly was utilizing coinless as the appropriate surrogate, it totally failed to include in its analysis, or identify to the FCC, that it had unilaterally eliminated the more expensive *coinless* station. Without a candid identification of costs to the FCC, the FCC can not hope to determine any reasoned cost basis which would accurately reflect the underlying cost of payphone facilities.

Beyond the issue of the candor and accuracy used in determining the pool of fixed payphone costs, the FCC must then average recovery of those costs across the calling traffic utilizing that payphone station. Without belaboring the arguments already made before the FCC regarding the cost inputs utilized by the companies, a review of this second step alone reflects that the cost analyses are not as disparate as they would appear. Both AT&T and MCI analyses argue that the appropriate fixed pool of costs are most appropriately reflected by the cost of a coinless payphone station. As is typical in telecommunications, most cost are lumpy, fixed costs. These costs do not vary whether a payphone station processes one or five-hundred calls. Since recovery of those costs from the first call alone is impractical, these costs are theoretically averaged over all of the traffic from that payphone station to uniformly recover those costs over a period of time.

Without the above adjustments to Hatfield's fixed costs analysis, Hatfield claims that the coinless payphone station costs $422.63 per year. MCI Comments of July 1, 1996, Hatfield at 3. AT&T provides an analysis for a coinless payphone station at $922.20 per year ($76.85 per month). AT&T Remand Comments at 11. According to both MCI and AT&T, these are the fixed costs of an existing coinless payphone station. Although these costs must be recovered from all of the traffic through that payphone station, both AT&T and MCI presume that a coinless payphone station will recover the specific fixed costs of that coinless station from coin traffic. Coin traffic can only be generated from a coin instrument payphone station which has a different fixed cost basis. In the over twelve years of the history of the IPTA, there is not been one known incident of a coin call having been placed over a coinless payphone station. When an independent payphone provider incurs fixed costs to establish a coinless payphone station, those fixed costs are recovered from the coinless traffic through that phone. To increase that traffic by the addition of coin traffic, additional fixed investments must be made by the payphone provider to include all of the fixed costs necessary for processing coin traffic. Although this additional investment may be logical to reach the additional traffic, it is still impossible to reach that additional traffic without incurring these additional fixed costs for the coin instrumentality. Both MCI and AT&T, in purportedly determining the fixed costs of a coinless station, failed to appropriately utilize the coinless traffic through that station in determining an average fixed cost per coinless call.

To determine how a payphone provider recovers the fixed costs of a coinless payphone station, those fixed costs must be averaged over the coinless traffic through that payphone station. In addressing the Hatfield analysis' annual fixed cost of $422.63 per coinless station per year, the SNET New Hampshire study would reflect that there are somewhat less than 9,747,286 non-coin calls per year.[3] Dividing the 9,747,286 non-local coin calls by the 7,913 payphone stations, this averages 1,232 calls per station. Dividing Hatfield's station costs of $422.63 by the 1,232 calls this averages a fixed cost of $0.343 per call.

AT&T utilizes the same apples and oranges comparison in its cost arguments submitted in the Remand comments. After eliminating any costs, or ability, for the payphone station to handle coin traffic, AT&T concludes that there are station costs of $76.85 per month for an existing coinless station. AT&T then purports to attempt to recover this fixed coinless station cost from the coin traffic, which must occur on a different payphone station and which requires the inclusion of fixed coin equipment investment. AT&T relies upon the traffic information in the APCC Comments, filed July 1, 1996, at page 5, to average its coinless payphone station costs over an average of 700 calls per station per month, which primarily constitutes coin traffic. AT&T Remand Comments at 11; AT&T Remand Comments, David Robinson Affidavit at 12. However, the APCC comments indicate that of the approximate 700 calls per month, 500 constitute coin traffic and 200 non-coin traffic. Since the only traffic on the coinless payphone station identified by AT&T would be the non-coin traffic, the fixed cost of that station must be recovered over the 200 coinless calls from that station.[4] Applying the APCC traffic figures of 200 coinless calls per station per month to AT&T's determination of fixed coinless costs, the average incremental cost

3 This takes Hatfield's total calls of 40,407,545 less the 30,660,259 local coin calls identified in the SNET study, p. 87. Presumably, the remaining number includes non-local coin traffic as well.

4 The estimate of 700 calls per month traffic, with approximately 200 such coins being coinless, is confirmed by the additional data submitted by People's Remand Comments at 6 (168 of 723 calls are coinless) and CCI's Remand Comments at 8 (183 of 720 calls per month are coinless).

per call would be $0.384 per call. Utilizing the traffic figures of CCI, this would amount to a fixed cost of $0.42 per call. The traffic figures of People's would reflect an average fixed cost figure of $0.457 per call.

As should be clear from the above, there are numerous methods of addressing cost analysis. Even with reasonable efforts, cost analysis at best is subject to considerable variations in results. However, the IPTA submits that even despite some of the obvious errors in the MCI and AT&T analysis, which will be addressed more thoroughly by other parties, simply correcting the applicable traffic figures for a coinless payphone station to the coinless traffic it handles identifies that the range of average fixed costs per call is no where near as expansive as interexchange carriers would purport the FCC to believe. Even MCI's Hatfield's less than credible fixed station costs per year shows an average incremental cost per coinless call of $0.343. AT&T's fixed coinless station costs would average between $0.384 and $0.457 per coinless call. These do not substantially differ from the fixed cost per coinless calls submitted by the more accurate and detailed data of the payphone providers.

IV. CONCLUSION.

The Illinois Public Telecommunications Association respectfully submits that the local coin rate of $0.35 per call is a market based compensation at the lowest market rate by which payphone services are available. The market rate for utilizing payphone services, including operator assistance services such as those promoted by the interexchange carriers in their access code operator traffic, ranges from $0.35 per call to rates in excess of $2.00 per call. Compensation below the lowest market rate available for use of the payphone services would be arbitrary and capricious, as recognized by both the cost data and the market data submitted of record.

Respectfully submitted,
Illinois Public Telecommunications Association

Michael W. Ward

Michael W. Ward
One of Its Attorneys

Michael W. Ward
John F. Ward, Jr.
Henry T. Kelly
O'Keefe, Ashenden Lyons & Ward
30 North LaSalle, Suite 4100
Chicago, IL 60602
312-621-0400

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of September, 1997, I caused copies of the foregoing Comments of the Illinois Public Telecommunications Association to be served upon the parties on the attached service list by first class mail.

Alberta Seiler

Alberta Seiler

ACTEL, Inc.
P. O. Box 391
Cedar Knolls, NJ 07927

Patricia A. Hahn
Airports Council International-North America
1775 K St., NW, Suite 500
Washington, D.C. 20006

Charles H. Kennedy
Morrison & Foerster
2000 Pennsylvania Ave., NW
Washington, D.C. 20006-1888
Counsel for Airports Council
International-North America

Derek Blake
American Airlines Admirals Club
P. O. Box 619616, MD 2645
DFW Airport, TX 75261-9616

Charles M. Barclay
American Association of Airport Executives
4212 King Street
Alexandria, VA 22302

Kevin Maher
American Hotel & Motel Association
1201 New York Ave., NW, Suite 600
Washington, D.C. 20005-3917

Albert H. Kramer
Robert F. Aldrich
Dickstein, Shapiro, Morin & Oshinsky, L.L.P.
2101 L Street, NW
Washington, D.C. 20037-1526
Attorneys for American Public
Communications Council

Alan N. Baker
Ameritech
2000 West Ameritech Center Dr.
Hoffman Estates, IL 60196

Paul J. Berman
Alane C. Weixel
Covington & Burling
1201 Pennsylvania Ave., NW
P.O. Box 7566
Washington, D.C. 20044-7566
Attorneys for Anchorage Telephone Utility

E. Ashton Johnston
Paul, Hastings, Janofsky & Walker
1299 Pennsylvania Ave., NW, 10th Floor
Washington, D.C. 20004-2400
Attorneys for Arch Communications
Group, Inc.

John M. Goodman
Edward D. Young, III
Bell Atlantic
1133 20th Street, NW
Washington, D.C. 20036

M. Robert Sutherland
Theodore R. Kingsley
BellSouth Corporation
1155 Peachtree St., NE, Suite 1700
Atlanta, GA 30309-3610

Robert M. Brill, Esq.
757 Third Ave., 12th Floor
New York, NY 10017

Rachel J. Rothstein
Cable & Wireless, Inc.
8219 Leesburg Pike
Vienna, VA 22182

Thomas J. MacBride, Jr.
Kathryn A. Fugere
Goodin, MacBride, Squeri,
Schlotz & Ritchie, LLP
505 Sansome St., Suite 900
San Francisco, CA 94111
Attorneys for the California Association
of Long Distance Telephone Companies

Martin A. Mattes
Graham & James
One Maritime Plaza, Suite 300
San Francisco, CA 94111
Attorneys for California Payphone Assn.

Peter Arth,. Jr.
Edward W. O'Neill
Patrick S. Berdge
505 Van Ness Avenue
San Francisco, CA 94102
Attorneys for the People of the State of California and the Public Utilities Commission of the State of California

Glenn Stehle
Call West Communications, Inc.
701 N. St. Mary's
San Antonio, TX 78205

James A. Thelen
The Cleveland Clinic Foundation
9500 Euclid Avenue
Cleveland, OH 14195

C. Douglas McKeever
Communications Central Inc.
1150 Northmeadow Parkway, Suite 188
Roswell, GA 30076

Genevieve Morelli
Competitive Telecommunications Assn.
1140 Connecticut Ave., NW, Suite 220
Washington, D.C. 20036

Danny E. Adams
Steven A. Augustino
Kelly Drye & Warren LLP
1200 Nineteenth St., NW, Suite 500
Washington, D.C. 20036
Attorneys for Competitive Telecommunications Association

Kevin E. Cox
Dallas/Fort Worth International Airport
3200 East Airfield Drive
Post Office Drawer 619428
DFW Airport, TX 75261-9428

J. Christopher Dance
Kerry Tassopoulos
Excel Telecommunications, Inc.
8750 North Central Expressway, 20th Floor
Dallas, TX 75231
Thomas K. Crowe, Esq.
2300 M St., NW, Suite 800
Washington, D.C. 20037
Counsel for Excel Telecommunications, Inc.

Cynthia B. Miller
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Angela B. Green
Florida Public Telecommunications Association, Inc.
125 S. Gadsden St., Suite 200
Tallahassee, FL 32301

Joseph Kelley
Flying J Inc.
P. O. Box 678
Brigham City, UT 84302-0678

Roy L. Morris
Frontier Corporation
1990 M St., NW, Suite 500
Washington, D.C. 20036

Michael Shortley
Frontier Corporation
180 South Clinton Avenue
Rochester, NY 14646

Newton M. Galloway
113 Concord Street
Zebulon, GA 30295
Attorney for Georgia Public Communications Association

Albert H. Kramer
Robert F. Aldrich
Dickstein, Shapiro, Morin & Oshinsky, L.L.P.
2101 L St., NW
Washington, D.C. 20037-1526
Special Attorneys for Georgia Public Communications Association

Robert C. Caprye
GVNW, Inc./Management
7125 S.W. Hampton Street
Portland, OR 97223

Ralph Nelson
Marsha H. Smith
Dennis S. Hansen
Idaho Public Utilities Commission
472 West Washington Street
P. O. Box 83720
Boise, ID 83720-0074

Hank Smith
Independent Technologies, Inc.
11422 Miracle Hills Drive
Omaha, NE 68154

Robert C. Glazier
Indiana Utility Regulatory Commission
Indiana Government Center South
302 West Washington, Suite E306
Indianapolis, IN 46204

Albert H. Kramer
Robert F. Aldrich
Jacob S. Farber
Dickstein Shapiro Morin & Oshinsky L.L.P.
2101 L Street, NW
Washington, D.C. 20037-1526
Attorneys for Inmate Calling Services
Providers Coalition

Judith St. Ledger-Roty
Enrico C. Soriano
Wendy I. Kirchick
Reed Smith Shaw & McClay
Suite 1100 - East Tower
1301 K Street, NW
Washington, D.C. 20005-3317
Attorneys for The Intelicall Companies

C. Douglas McKeever
InVision Telecom, Inc.
1150 Northmeadow Parkway, Suite 118
Roswell, GA 30076

William H. Smith, Jr.
Sandra Makeeff
Iowa Utilities Board
Lucas State Office Bldg.
Des Moines, IA 50319

Bryan Peterson
Kampgrounds of America, Inc.
P. O. Box 30558
Billings, MT 59114

Robert E. Cohn
Alexander Van der Bellen
Shaw, Pittman, Potts & Trowbridge
2300 N Street, NW
Washington, DC 20037
Attorneys for the City of
Kansas City, Missouri

Catherine R. Sloan
Richard C. Fruchterman
Richard S. Whitt
LDDS WorldCom
1120 Connecticut Ave., NW, Suite 400
Washington, D.C. 20036

Douglas F. Brent
LDDS WorldCom
9300 Shelbyville Road, Suite 700
Louisville, KY 40222

Joel B. Shifman
Maine Public Utilities Commission
242 State St. House Station No. 18
Augusta, ME 04333-0018

Mary J. Sisak
Donald J. Elardo
MCI Telecommunications Corp.
1801 Pennsylvania Ave., NW
Washington, D.C. 20006

William R. Ralls
Leland R. Rosier
Butzel Long
118 West Ottawa St.
Lansing, MI 48933
Attorneys for Michigan Pay
Telephone Association

Willard C. Reine
314 East High Street
Jefferson City, MO 65101
Counsel for the Midwest Independent
Coin Payphone Association

National Association of RV Parks
and Campgrounds
8605 Westwood Center Dr., Suite 201
Vienna, VA 22182-2231

Richard A. Askoff
Donna A. DiMartino
National Exchange Carrier Association, Inc.
100 South Jefferson Road
Whippany, NJ 07981

David Cosson
Pamela Sowar Fusting
National Telephone Cooperative Assn.
2626 Pennsylvania Ave., NW
Washington, D.C. 20037

W. Dewey Clower
NATSO, Inc.
1199 North Fairfax St., Suite 801
P.O. Box 1285
Alexandria, VA 22313-1285

E. Barclay Jackson
New Hampshire Public Utilities Commission
8 Old Suncook Road
Concord, NH 03301-7310

Blossom A. Peretz
New Jersey Division of the
Ratepayer Advocate
31 Clinton St., 11th Floor
Newark, NJ 07101

New Jersey Payphone Association
108 Main Street
Oceanport, NJ 07757-1030

David Kaufman
New Mexico State Corporation Commission
Post Office Drawer 1269
Santa Fe, NM 87504-1269

Martin Cintron
Salvadore Uy
Gary S. Lutzker
Harley J. Goldstein
New York City Department of Information
Technology and Telecommunications
11 Metrotech Center, 3rd Floor
Brooklyn, NY 11201

Maureen O. Helmer
Mary Burgess
Penny Rubin
New York State Dept. of Public Service
Three Empire State Plaza
Albany, NY 12223

Ann E. Henkiner
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43215-3793

Ernest G. Johnson
Cece Wood
Maribeth D. Snapp
Oklahoma Corporation Commission
P. O. Box 25000-2000
Oklahoma City, OK 73152-2000

Mitchell F. Brecher
Fleischman and Walsh, L.L.P.
1400 Sixteenth St., NW
Washington, D.C. 20036
Attorneys for Oncor Communications, Inc.

Judith St. Ledger-Roty
Enrico C. Soriano
Wendy I. Kirchick
Reed Smith Shaw & McClay
Suite 1100-East Tower
1301 K Street, NW
Washington, D.C. 20005-3317
Attorneys for Paging Network, Inc.

Terrence J Buda
Veronica A. Smith
John F. Povilaitis
Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, PA 17105-3265

Bruce W. Renard
Peoples Telephone Company, Inc.
2300 NW 89th Place
Miami, FL 33172

Eric L. Bernthal
Michael S. Wroblewski
Latham & Watkins
1001 Pennsylvania Ave., NW, Suite 1300
Washington, D.C. 20004
Attorneys for Peoples Telephone
Company, Inc.

Mark J. Golden
Personal Communications
Industry Association
500 Montgomery St., Suite 700
Alexandria, VA 22314-1561

Katherine M. Holden
Stephen J. Rosen
Wiley, Rein & Fielding
1776 K St., NW
Washington, D.C. 20006
Attorneys for Personal Communications
Industry Association

Joe D. Edge
Sue W. Bladek
Drinker, Biddle & Reath
901 Fifteenth St., NW
Washington, D.C. 20005
Attorneys for Puerto Rico
Telephone Company

Michael K. Kellogg
Jeffrey A. Lamken
Kevin J. Cameron
Kellogg, Huber, Hansen, Todd & Evans
1301 K St., NW, Suite 1000 West
Washington, D.C. 20005
Counsel for the RBOC Payphone Coalition

Susan Drombetta
Scherers Communications Group, Inc.
575 Scherers Court
Worthington, OH 43085

Reginald R. Bernard
SDN Users Association, Inc.
P. O. Box 4014
Bridgewater, NJ 08807

Clifton Craig, Jr.
South Carolina Public
Communications Association
1132 S. Center Road
Darlington, SC 29532

John F. Beach, P.A.
1400 Main St., Suite 1207
Post Office Box 444
Columbia, SC 29202-0444
Counsel for South Carolina Public
Communications Association

Robert M. Lynch
Durward D. Dupre
Mary W. Marks
J. Paul Walters, Jr.
Southwestern Bell Telephone Company
One Bell Center, Room 3536
St. Louis, MO 63101

Leon M. Kestenbaum
Jay C. Keithley
H. Richard Juhnke
Sprint Corporation
1850 M St., NW, 11th Floor
Washington, D.C. 20036

Charles C. Hunter
Hunter & Mow, P.C.
1620 I St., NW, Suite 701
Washington, D.C. 20006
Attorneys for Telecommunications
Resellers Association

Teresa Marrero
Judith E. Herman
Teleport Communications Group Inc.
Two Teleport Dr., Suite 300
Staten Island, NY 10301

Pat Wood, III
Robert W. Gee
Judy Walsh
Public Utility Commission of Texas
7800 Shoal Creek Blvd.
Austin, TX 78757

Mary McDermott
Linda Kent
Charles D. Cosson
United States Telephone Association
1401 H St., NW, Suite 600
Washington, D.C. 20005

Sondra J. Tomlinson
Daniel L. Poole
U S WEST, Inc.
1020 19th St., NW, Suite 700
Washington, D.C. 20036

George E. Young
Vermont Public Service Board
Drawer 20
Montpelier, VT 05620-2701

Sheldon M. Katz
Vermont Department of Public Service
Drawer 20
Montpelier, VT 05620-2601

Edward C. Addison
Virginia State Corporation Commission
1300 East Main St. - 9th Floor
P. O. Box 1197
Richmond, VA 23218

Rogert B. Skrypczak
Wisconsin Public Communications Assn.
W6246 County Trunk BB, Suite B
Appleton, WI 54915

E. M. Thurmond
Yuma International Airport
2191 E. 32nd Street
Yuma, AZ 85365